

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, ) No. 05-cr-10175-WGY-1  
Plaintiff, )  
v. ) MOTION FOR PERMISSION TO TRAVEL  
NADINE J. GRIFFIN, ) OUTSIDE OF DISTRICT WHILE  
Defendant. ) REMAINING ON BOND

COMES NOW the Defendant Nadine Griffin, by and through her attorney of record, and moves this honorable Court for an Order allowing Ms. Griffin to travel outside the Commonwealths of Massachusetts and New Hampshire, the judicial districts to which she is confined by order of this Court which granted Ms. Griffin to remain on bond pending sentencing in this case. In support of this motion, Ms. Griffin would show the Court the following:

1. Ms. Griffin remains on bond which secures her appearance before this Court in this matter.
2. The post trial terms per order of this Court require that Ms. Griffin not travel outside the Commonwealths of Massachusetts and New Hampshire without permission of this Court.
3. The pre-verdict terms allowed Ms. Griffin to travel in the Commonwealths of Massachusetts and New Hampshire, as well as in the State of Florida. It was only after verdict that this Court removed the travel availability to and in Florida.

Motion For Travel

- 1 -

Alan S. Richey  
Attorney at Law  
P.O. Box 1505  
Port Hadlock, Washington 98339  
(360) 437-4005

1 4. Ms. Griffin has previously traveled to Florida pre-verdict without incident and has  
2 appeared at every matter before this Court.

3 5. Ms. Griffin's father passed away on November 30, 2006 at his home in New  
4 Hampshire. This is relevant because now Ms. Griffin does not need to take care of her father  
5 over the holidays.

6 6. Ms. Griffin wishes to visit her son and her sister in Florida during the Holiday  
7 season. Ms. Griffin will be staying with her son, Andrew Sanchez.

8 7. Ms. Griffin seeks entry of an Order by this Court allowing her to travel outside the  
9 Commonwealths of Massachusetts and New Hampshire as follows:

10 <b>DESTINATION</b>	<b>TIME PERIOD</b>	<b>PURPOSE</b>
11 Andrew Sanchez (son), 401 Rosery Rd., 12 Largo Fla. 33770; phone 727-348-5464	December 21-28	visit son and sister

13 Travel will be by Southwest Airlines. Ms. Griffin will always be available at the  
14 telephone number listed, as well as by her cellular phone 727-418-9864, or her sister's home  
15 phone 727-374-3151.

16 8. Ms. Griffin remains on bond and has appeared before this Court for all hearings and  
17 for trial. During her prior travels, she remained in contact with pretrial services, as required.

18 9. After completing the travel noted, Ms. Griffin will remain under the terms of the  
19 bond in the Commonwealths of Massachusetts and New Hampshire.

20  
21 WHEREFORE, based on the foregoing, Ms. Griffin respectfully prays that this  
22 Honorable Court, after duly considering this motion, enter an Order granting travel to Florida  
23 as requested.  
24  
25

Motion For Travel

- 2 -

Alan S. Richey  
Attorney at Law  
P.O. Box 1505  
Port Hadlock, Washington 98339  
(360) 437-4005

Respectfully submitted this 13<sup>th</sup> day of December, 2006.

/s/ Alan S. Richey  
Alan Stuart Richey, WSBA # 30578  
Counsel for Nadine J. Griffin, defendant  
P.O. Box 1505, Port Hadlock, Washington 98339  
Phone: (360) 437-4005  
Email: [asratty@gmail.com](mailto:asratty@gmail.com)

CERTIFICATE OF CONFERENCE

Defense counsel spoke with Christopher Maietta regarding this motion. Mr. Maietta does/does not oppose Ms. Griffin's travel to Florida.

/s/ Alan Richey  
Alan Richey

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT the foregoing was served on counsel for the government through the Court's ECF system.

/s/ Alan Richey  
Alan Richey

Motion For Travel

- 3 -

Alan S. Richey  
Attorney at Law  
P.O. Box 1505  
Port Hadlock, Washington 98339  
(360) 437-4005